

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
PECOS DIVISION

UNITED STATES OF AMERICA, §  
§  
Plaintiff, §  
§  
v. § CRIMINAL NO. P-23-CR-279-DC  
§  
SONYA CONCHITA MURILLO, §  
§  
Defendant. §  
§

**UNITED STATES OF AMERICA'S  
BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

The Indictment (Doc. 12), returned on June 28, 2023, gave notice that the United States seeks the criminal forfeiture of certain property from the Defendant indicted in the instant case pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2), and (3) for the violation of Title 18 U.S.C. §§ 2251(a) and 2252A(a)(2).

Specifically, this Bill of Particulars seeks the criminal forfeiture of the property listed herein.

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
[See Fed. R. Crim. P. 32.2]

**I.**

**Sexual Exploitation of Children Violation and Forfeiture Statutes**  
[Title 18 U.S.C. §§ 2251(a) and 2252A(a)(2), subject to  
forfeiture pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2), and (3)]

As a result of the criminal violations set forth above, the United States gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

**Title 18 U.S.C. § 2253. Criminal forfeiture**

**(a) Property subject to criminal forfeiture.**-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

- (1)** any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2)** any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3)** any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraph II.

**II.**  
**Property**

1. Samsung Galaxy S20, serial number R3CN30FQTPK, IMEI: 3540 8411 2465 006; and
2. Any and all other property involving any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260.

Respectfully submitted,  
JAIME ESPARZA  
United States Attorney

By: /s/  
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Attorneys for the United States of America

**CERTIFICATE OF SERVICE**

I hereby certify that on January 9, 2024, the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant:

Bart Edward Medley  
Email: bart@bartmedley.com  
*Attorney for Defendant Sonya Conchita Murillo*

/s/  
MARK TINDALL  
Assistant United States Attorney